Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
P. O. Box 200901 Helena, MT 59620-0901 (406) 444-2544 Website: www.deq.mt.gov

October 17, 2012

David H. Garland
General Manager
Sidney Sugars, Incorporated
35140 County Road 125
Sidney, MT 59270

RE: Final Title V Operating Permit #OP1826-09

Dear Mr. Garland:

The Department of Environmental Quality has prepared the enclosed Final Operating Permit#OP1826-09, for Sidney Sugars, Inc., located in Sidney, Montana. Please review the cover page of the attached permit for information pertaining to the action taking place on Permit #OP1826-09.

If you have any questions, please contact Tashia Love, the permit writer, at (406) 444-5280 or by email at tlove2@mt.gov.

Sincerely,

Julie A Merkel

Julie Merkel
Air Permitting Supervisor
Air Resources Management Bureau
(406) 444-3626

Tashia Love
Environmental Science Specialist
Air Resources Management Bureau
(406) 444-5280

JM: TL
Enclosure
Cc: DJ Law, US EPA Region VIII 8P-AR
Carson Coate, USEPA Region 8 - Montana Operations
David. H. Garland, Sidney Sugars, Inc.

State of Montana
Department of Environmental Quality
Helena, Montana 59620

AIR QUALITY OPERATING PERMIT NUMBER OP1826-09

Issued to: **Sidney Sugars, Incorporated**
35140 County Road 125
Sidney, MT 59270
Final Date: **October 15, 2012**
Expiration Date: **April 28, 2017**

Effective Date: October 15, 2012
Date of Decision: September 13, 2012

Administrative Amendment (AA) Application Received: August 15, 2012
Application Deemed Administratively Complete: August 15, 2012
Application Deemed Technically Complete: August 15, 2012
AFS Number: **030-083-0022A**

Permit Issuance and Appeal Processes: In accordance with Montana Code Annotated (MCA) Sections 75-2-217 and 218 and the Administrative Rules of Montana (ARM), ARM Title 17, Chapter 8, Subchapter 12, Operating Permit Program, this operating permit is hereby issued by the Department of Environmental Quality (Department) as effective and final on July 11, 2012. This permit must be kept on-site at the above named facility.

Montana Air Quality Operating Permit
Department of Environmental Quality

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit have the meaning assigned to them in the referenced regulations.

SECTION I. GENERAL INFORMATION

The following general information is provided pursuant to ARM 17.8.1210(1).

Company Name: **Sidney Sugars Incorporated**

Mailing Address: **35140 County Road 125**

City: **Sidney** State: **MT** Zip: **59270**

Plant Location: **NW ¼, NW ¼, Section 34, Township 23 North, Range 59 East, Richland County, Montana**

Responsible Official: **David H. Garland** Phone: **(406) 433-9333**
dgarland@crystalsugar.com

Facility Contact Person: **David H. Garland** Phone: **(406) 433-9333**

Primary SIC Code: **2063**

Nature of Business: **Sugar Beet Processing/Sugar Production**

Description of Process: Sugar beets are trucked to the plant, screened for dirt and rock, and either fed into the plant or moved to storage. Additional dirt is removed in a washing process. The beets enter the plant and are sliced into long thin strips, referred to as cossettes. The cossettes are run into a diffuser where the beet sugar is removed with water and heat. The juice is then purified, followed by evaporation of a portion of the entrainment liquid, and finally crystallized. The remaining liquid (molasses) is removed in a centrifuge. Crystallized sugar is then sized, packaged and shipped, and the molasses is sold primarily as a feed supplement or combined with the pulp in a pelletizing process, and sold as livestock feed. Approximately 80% of the final product (sugar) is shipped by rail with the remaining shipped by truck.

SECTION II. SUMMARY OF EMISSION UNITS

The emission units regulated by this permit are the following [ARM 17.8.1211]:

Emission Unit ID	Description	Pollution Control
EU001	#1 Combustion engineering (CE) coal-fired boiler [115MMBtu/hr]	Anderson 2000 Inc. Venturi scrubber and separator
EU002	#2 Combustion engineering (CE) coal-fired boiler [115 MMBtu/hr]	Anderson 2000 Inc. Venturi scrubber and separator
EU003	#3 Union Pacific natural gas/fuel oil-fired boiler [130 MMBtu/hr & 100,000 lb of steam/hr]	None
EU005	#4 Union Pacific natural gas/fuel oil-fired boiler [83 MMBtu/hr & 60,000 lb of steam/hr]	None
EU007	Superior Mohawk natural gas-fired boiler [25.1 MMBtu/hr]	None
EU022	Coal Handling and Storage - Coal Belt Feeders (2) - Coal Screw Conveyors (4) - Crusher - Coal Elevator - Coal Bunker	Baghouse Filter and enclosed conveyor(s)
EU024A&B	#1 Stearns-Roger Pulp Dryer [95 MMBtu/hr]	Cyclones
EU025A&B	#2 Stearns-Roger Pulp Dryer [95 MMBtu/hr]	Cyclones
EU026A&B	Dry Pulp Handling Screw Conveyors (18)	Dry Cyclone Separator
EU030	Pellet Mills and Cooler - Pellet Mills (4) - Pellet Cooler	Cyclone
EU031	Pellet Tank Exhaust Fan - Mechanical Conveyors (3) - Oscillating Pellet Screen - Pneumatic Conveyors (2) - Pellet Tank	None
EU043A	Slaker Building Vent - Pebble Lime Hopper - Lime Kiln Pan Feeder	Baghouse
EU020	Granulators	Wet Scrubber
EU027	Weibul Conditioner System	Baghouse Filter
EU028	Reclaiming sugar from silos and packaging (Hoffman Vent)	Baghouse Filter
EU047-EU056	Sugar Silos (#7- #16)	Filter Vents
EU101	Beet Unloading and Handling - Wet Flume Hopper (2) Beet Pilers (on site)	None
EU102	Coal Unloading Truck Hoppers (2)	None
EU103	Coke Unloading and Handling Railcar Unloader (belt conveyor) Bucket Elevator Coke Vibrating Feeder	None
EU104	Lime Unloading and Handling Railcar Unloader (belt conveyor) Limerock Reciprocating Feeder Limerock Covered Belt Conveyor Limerock Scalping Screen Limerock Vibrating Feeder Belt Conveyors (2)	None
EU500	Haul Roads	Water Application

SECTION III PERMIT CONDITIONS

The following requirements and conditions are applicable to the facility or to specific emission units located at the facility [ARM 17.8.1211, 1212, and 1213].

A. Facility-Wide

Condition(s)	Rule Citation	Rule Description	Pollutant/Parameter	Limit
A.1	ARM 17.8.105	Testing Requirements	Testing Requirements	-------
A.2	ARM 17.8.304(1)	Visible Air Contaminants	Opacity	40%
A.3	ARM 17.8.304(2)	Visible Air Contaminants	Opacity	20%
A.4	ARM 17.8.308(1)	Particulate Matter, Airborne	Fugitive Opacity	20%
A.5	ARM 17.8.308(2)	Particulate Matter, Airborne	Reasonable Precautions	-------
A.6	ARM 17.8.308	Particulate Matter, Airborne	Reasonable Precaution, Construction	20%
A.7	ARM 17.8.309	Particulate Matter, Fuel Burning Equipment	Particulate Matter	$E= 0.882 * H^{-0.1664}$ Or $E= 1.026 * H^{-0.233}$
A.8	ARM 17.8.310	Particulate Matter, Industrial Processes	Particulate Matter	$E= 4.10 * P^{0.67}$ or $E= 55 * P^{0.11}- 40$
A.9	ARM 17.8.322(4)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (liquid or solid fuels)	1 lb/MMBtu fired
A.10	ARM 17.8.322(5)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (gaseous)	50 gr/100 CF
A.11	ARM 17.8.324(3)	Hydrocarbon Emissions, Petroleum Products	Gasoline Storage Tanks	-------
A.12	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	65,000 Gallon Capacity	-------
A.13	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	Oil-effluent Water Separator	-------
A.14	ARM 17.8.342	NESHAPs General Provisions	SSM Plans	Submittal
A.15	ARM 17.8.1211(1)(c) and 40 CFR Part 98	Greenhouse Gas Reporting	Reporting	-------
A.16	ARM 17.8.1212	Reporting Requirement	Prompt Deviation Reporting	-------
A.17	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-------
A.18	ARM 17.8.1207	Reporting Requirements	Annual Certification	-------
A.19	ARM 17.74.359	Asbestos Abatement	Asbestos	-------

Conditions

A.1. Pursuant to ARM 17.8.105, any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct test, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

Compliance demonstration frequencies that list “as required by the Department” refer to ARM 17.8.105. In addition, for such sources, compliance with limits and conditions listing “as required by the Department” as the frequency, is verified annually using emission factors and engineering calculations by the Department’s compliance inspectors during the annual emission inventory review; in the case of Method 9 tests, compliance is monitored during the annual inspection by the compliance inspector.

A.2. Pursuant to ARM 17.8.304(1), Sidney Sugars shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.

A.3. Pursuant to ARM 17.8.304(2), Sidney Sugars shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.

A.4. Pursuant to ARM 17.8.308(1), Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.

A.5. Pursuant to ARM 17.8.308(2), Sidney Sugars shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter, unless otherwise specified by rule or in this permit.

A.6. Pursuant to ARM 17.8.308, Sidney Sugars shall not operate a construction site or demolition project unless reasonable precautions are taken to control emissions of airborne particulate matter. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.7. Pursuant to ARM 17.8.309, unless otherwise specified by rule or in this permit, Sidney Sugars shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel burning equipment and new fuel burning equipment calculated using the following equations:

For existing fuel burning equipment (installed before November 23, 1968): $E = 0.882 * H^{-0.1664}$

For new fuel burning equipment (installed on or after November 23, 1968): $E = 1.026 * H^{-0.233}$

Where H is the heat input capacity in million BTU (MMBtu) per hour and E is the maximum allowable particulate emission rate in pounds per MMBtu.

A.8. Pursuant to ARM 17.8.310, unless otherwise specified by rule or in this permit, Sidney Sugars shall not cause or authorize particulate matter to be discharged from any operation, process, or activity into the outdoor atmosphere in excess of the maximum hourly allowable emissions of particulate matter calculated using the following equations:

For process weight rates up to 30 tons per hour: $E = 4.10 * P^{0.67}$
For process weight rates in excess of 30 tons per hour: $E = 55.0 * P^{0.11} - 40$

Where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour.

A.9. Pursuant to ARM 17.8.322(4), Sidney Sugars shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million BTU fired, unless otherwise specified by rule or in this permit.

A.10. Pursuant to ARM 17.8.322(5), Sidney Sugars shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions, unless otherwise specified by rule or in this permit.

A.11. Pursuant to ARM 17.8.324(3), Sidney Sugars shall not load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device or is a pressure tank as described in ARM 17.8.324(1), unless otherwise specified by rule or in this permit.

A.12. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Sidney Sugars shall not place, store, or hold in any stationary tank, reservoir, or other container of more than 65,000 gallon capacity, any crude oil, gasoline or petroleum distillate having a vapor pressure of 2.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir, or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is designed and equipped with a vapor loss control device, properly installed, in good working order and in operation.

A.13. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Sidney Sugars shall not use any compartment of any single or multiple-compartment oil-effluent water separator, which compartment receives effluent water containing 200 gallons a day or more of any petroleum product from any equipment processing, refining, treating, storing or handling kerosene or other petroleum product of equal or greater volatility than kerosene, unless such compartment is equipped with a vapor loss control device, constructed so as to prevent emission of hydrocarbon vapors to the atmosphere, properly installed, in good working order and in operation.

A.14. Pursuant to ARM 17.8.342 and 40 CFR 63.6, Sidney Sugars shall submit to the Department a copy of any startup, shutdown, and malfunction (SSM) plan required under 40 CFR 63.6(e)(3) within 30 days of the effective date of this operating permit (if not previously submitted), within 30 days of the compliance date of any new National Emission Standard for Hazardous Air Pollutants (NESHAPs) or Maximum Achievable Control Technology (MACT) standard, and within 30 days of the revision of any such SSM plan, when applicable. The Department requests submittal of such plans in electronic form, when possible.

A.15. Pursuant to ARM 17.8.1211(1)(c) and 40 CFR Part 98, Sidney Sugars shall comply with requirements of 40 CFR Part 98 – Mandatory Greenhouse Gas Reporting, as applicable (ARM 17.8.1211(1)(c), NOT an applicable requirement under Title V).

A.16. Sidney Sugars shall promptly report deviations from permit requirements including those attributable to upset conditions, as upset is defined in the permit. To be considered prompt, deviations shall be reported to the Department using the schedule and content as described in Section V.E (unless otherwise specified in an applicable requirement) (ARM 17.8.1212).

A.17. On or before February 15 and August 15 of each year, Sidney Sugars shall submit to the Department the compliance monitoring reports required by Section V.D. These reports must contain all information required by Section V.D, as well as the information required by each individual emissions unit. For the reports due by February 15 of each year, Sidney Sugars may submit a single report, provided that it contains all the information required by Section V.B & V.D. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including semiannual monitoring reports), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, ***"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete."***

A.18. By February 15 of each year, Sidney Sugars shall submit to the Department the compliance certification required by Section V.B. The annual certification required by Section V.B must include a statement of compliance based on the information available that identifies any observed, documented or otherwise known instance of noncompliance for each applicable requirement. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including annual certifications), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, ***"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete."***

A.19. Pursuant to ARM 17.74.359, Sidney Sugars shall comply with all the limitations and requirements of their Asbestos Abatement Annual Project Permit.

B. EU001 and EU002: Combustion Engineering (CE) Boilers

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
B.1, B.12, B.20, B.30, B.31	Venturi Scrubber with Wetted Elbow and Vertical Entrainment Separator	Operate and Maintain	Inspection and Log	Daily and During Any Maintenance	Semiannual
B.2, B.13, B.21, B.30, B.31	Fuel Sulfur Content	0.63% by Weight	Coal Sampling and Analysis	Weekly Sampling; Monthly Ave.	
B.3, B.14, B.22, B.30, B.31	Fuel Consumption	17.4 ton/hr	Log and Calculations	Daily	
B.4, B.15, B.23, B.30, B.31	Hours of Operation	4320 hr/yr	Log	Daily	
B.5, B.16, B.24, B.25, B.28, B.30, B.31	Opacity	20%	Visual Survey	Weekly When the System is Operated	
			Method 9	Once During Each Campaign	
B.6, B.7, B.17, B.25, B.28, B.30, B.31	Particulate Matter	0.10 lb/MMBtu 0.046 gr/dscf 23 lbs/hr	Method 5	Every 4 years	
B.8, B.17, B25, B.28, B.30, B.31	SO_2	0.43 lbs/MMBtu, 106.8 tons/yr	Method 6/6C	Every 4 years	

B.9, B.17, B25, B.28, B.30, B.31	SO_2	70% Removal Efficiency	Method 6/6C	Every 4 years	Semiannual
B.10, B.18, B.26, B.30, B.31	SO_2 and PM CAM Plan	ARM 17.8.1506	CAM Plan Appendix E	Ongoing	
B.11, B.19, B.19, B.27, B.29, B.30, B.31	Hazardous Air Pollutants	As Required by 40 CFR 63, Subpart JJJJJJ	As Required by 40 CFR 63, Subpart JJJJJJ	As Required by 40 CFR 63, Subpart JJJJJJ	As Required by 40 CFR 63, Subpart JJJJJJ

Conditions

B.1. Sidney Sugars shall install, operate, and maintain an Anderson 2000, Inc. Model WAV-162 wetted approach venturi scrubber with wetted elbow and an Anderson 2000, Inc. Model VES-162 vertical cyclonic entrainment separator on each CE boiler (ARM 17.8.752).

B.2. The sulfur content of the coal fired in the CE boilers shall not exceed 0.63% by weight, determined on a monthly average (ARM 17.8.749).

B.3. The fuel consumption by the CE boilers shall not exceed 17.4 tons/hour of coal (ARM 17.8.749).

B.4. Total annual hours of operation of each CE boiler shall not exceed 4,320 hours during any rolling 12-month time period (ARM 17.8.749).

B.5. Sidney Sugars may not cause or authorize to be discharged into the atmosphere from either CE boiler, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

B.6. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from each CE boiler particulate matter in excess of the following (ARM 17.8.752):

a. 0.10 lbs/MMBtu heat input; and

b. 0.046 gr/dscf.

B.7. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from both CE boiler stacks particulate matter in excess of 23 lbs/hr (ARM 17.8.752).

B.8. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere, for either CE boiler, SO_2 emissions in excess of the following (ARM 17.8.752):

a. 0.43 lbs/MMBtu heat input; and

b. 106.8 tons/yr.

B.9. Sidney Sugars shall maintain a minimum SO_2 removal efficiency of 70% by the control device on the CE boilers. Removal efficiency, in this case, shall be determined based on stack emissions from the CE boilers as a percentage of total sulfur in the coal fired boilers (ARM 17.8.752).

B.10. Sidney Sugars shall provide a reasonable assurance of compliance with emission limitations or standards for the anticipated range of operations of the CE Boilers for SO_2 and PM (ARM 17.8.1504).

B.11. Sidney Sugars shall comply will all applicable requirements of 40 CFR 63, Subpart JJJJJJ - NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers. These regulations shall apply, as appropriate (ARM 17.8.342 and 40 CFR 63, Subpart JJJJJJ).

Compliance Demonstration

B.12. The Anderson 2000, Inc. Model WAV-162 wetted approach venturi scrubber with wetted elbow and Anderson 2000, Inc. Model VES-162 vertical cyclonic entrainment separator shall be maintained and operated in accordance with manufacturer's procedures and inspected daily to minimize emissions and monitor compliance with the particulate, SO_2, and opacity standards. Log entries shall occur daily and during any maintenance activity or corrective action. A log of the following parameters shall be maintained (ARM 17.8.1213):

a. Date and time of entry;

b. Initials of individual entering information in the log;

c. Pressure readings (inlet, venturi, separator, mist eliminator, etc.) shall be measured and recorded;

d. The inlet/outlet temperature of each scrubber shall be measured and recorded; and

e. Records of control equipment and associated piping/ducts maintenance.

B.13. The heat content (Btu/ton) and sulfur content of the coal used to fuel the boilers shall be determined by sampling coal on a weekly basis. The heat and sulfur sampling and analysis shall be performed using Department-approved methods. At the end of each calendar month, Sidney Sugars shall calculate the monthly average of sulfur content (in weight percentage) in the shipments received for that month (ARM 17.8.1213).

B.14. Fuel consumption for each boiler shall be determined by calculating fuel required to produce enough heat that processed the tons of beets for that day. The following equation shall be used for each boiler to make this determination.

Tons of coal = pounds of steam * X * 1/24

Where;

Pounds of steam is equal to the total pounds of steam generated in the previous 24 hours.

X is the coal-to-steam ratio from the previous year; tons of coal purchased/pounds of steam generated by both boilers.

1/24 is equal to 1 day per 24 hours.

Sidney Sugars shall maintain these calculations in a log on site. The log shall contain date and time as well as the calculations. This will be used to monitor compliance with the hourly fuel consumption limit in Section III.B.3 (17.8.1213).

B.15. Sidney Sugars shall log the daily hours of operation and daily cumulative hours of operation on a rolling 12-month basis for the CE boilers. The log shall include the date, number of hours operated for that day, and maintain a cumulative total of hours operated during the previous 12 months (ARM 17.8.1213).

B.16. Sidney Sugars shall conduct either a Method 9 source test, one during each campaign, or a weekly visual survey of visible emissions on the CE Boilers, when in operation. Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the CE Boilers for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the source for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

B.17. Sidney Sugars shall perform Method 5 and Method 6 tests or other approved test methods in accordance with the Montana Source Test Protocol and Procedures Manual, on each CE boiler every four (4) years to monitor compliance with Section III.B.6, III.B.7, III.B.8 and III.B.9 (ARM 17.8.106 and ARM 17.8.1213).

B.18. Sidney Sugars shall monitor compliance for PM and SO_2 by following the Compliance Assurance Monitoring (CAM) Plan (Appendix E). The CAM Plan, written by Sidney Sugars in accordance with ARM 17.8.1504, is summarize in Appendix E and is available upon request by the Department or facility (ARM 17.8.1503 and ARM 17.8.1213).

B.19. Sidney Sugars shall meet the requirement for demonstration of compliance and testing procedures of 40 CFR 63, Subpart JJJJJJ - Industrial, Commercial, and Institutional Boilers, as applicable (ARM 17.8.342 and 40 CFR 63, Subpart JJJJJJ).

Recordkeeping

B.20. Sidney Sugars shall maintain on site the inspection and maintenance log for the venturi scrubber and vertical entrainment separator as required by Section III.B.12 (ARM 17.8.1212).

B.21. Sidney Sugars shall maintain records on site of heat and sulfur content of coal used as required by Section III.B.13 (ARM 17.8.1212).

B.22. Sidney Sugars shall maintain a log on site of daily fuel consumption calculations as required by Section III.B.14 (ARM 17.8.1212).

B.23. Sidney Sugars shall maintain a log on site of daily hours of operation for the CE boilers and 12-month cumulative total hours of operation as required by Section III.B.15 (ARM 17.8.1212).

B.24. If visual surveys are performed, Sidney Sugars shall maintain a log to verify that the visual surveys were performed as specified in Section III.B.16. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observers initials. If any corrective action is required, the time date, observer's initials, and any preventative or correction action taken must be recorded in the log (ARM 17.8.1212).

B.25. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

B.26. Records shall be prepared and data kept in accordance with ARM 17.8.1513 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and ARM 17.8.1513).

B.27. Sidney Sugars shall comply with all applicable record keeping requirements in accordance with 40 CFR 63, Subpart JJJJJJ, as applicable (ARM.8.342 and 40 CFR 63, Subpart JJJJJJ).

Reporting

B.28. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

B.29. Sidney Sugars shall comply with all applicable reporting requirements in accordance with 40 CFR 63, Subpart JJJJJJ, as applicable (ARM.8.342 and 40 CFR 63, Subpart JJJJJJ).

B.30. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

B.31. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.B.2 through III.B.8 and any deviation from the requirements to Section III.B.1, III.B.9 through III.B.11;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.B.12 through III.B.19;

c. A summary of any malfunction(s) of the control equipment required by Section III.B.1 and associated corrective action taken; and

d. A summary of any deviation from compliance with recordkeeping requirements as established by Section III.B.20 through III.B.27.

e. A summary of any reports submitted in accordance with Section III.C.31.

C. EU003 and EU005: Union Pacific Boilers

Conditions	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
C.1, C.7, C.12, C.18, C.19	Natural Gas Sulfur Content	50 Grains/100 Cubic Feet	Burning Pipeline Quality Natural Gas	Ongoing	Semiannual
C.2, C.8, C.13, C.18, C.19	Fuel Oil Sulfur Content	1 lb of Sulfur/MMBtu	Log; Supplier's Certification or Fuel Analysis	As Necessary During Fuel Oil Usage	
C.3, C.7, C.9, C.12, C.14, C.16, C.18, C.19	Particulate Matter	$E = 0.882 * H^{-0.1664}$ or $E = 1.026 * H^{-0.233}$	Burning Pipeline Quality Natural Gas	Ongoing	
			Method 5	As Required by Department and Section III.A.1	
C.4, C.7, C.10, C.12, C.14, C.16, C.18, C.19	Opacity	40%	Burning Pipeline Quality Natural Gas	Ongoing	
			Method 9	As Required by Department and Section III.A.1	
C.5, C.7, C.10, C.12, C.14, C.16 C.18, C.19	Opacity	20%	Burning Pipeline Quality Natural Gas	Ongoing	
			Method 9	As Required by Department and Section III.A.1	
C.6, C.11, C.15, C.17, C.18, C.19	Hazardous Air Pollutants	As Required by 40 CFR 63, Subpart JJJJJJ	As Required by 40 CFR 63, Subpart JJJJJJ	As Required by 40 CFR 63, Subpart JJJJJJ	As Required by 40 CFR 63, Subpart JJJJJJ

Conditions

C.1. The sulfur content of the natural gas fired in the Union Pacific Boilers shall not exceed 50 grains per 100 cubic feet of gaseous fuel (ARM 17.8.322).

C.2. The sulfur content of the fuel oil fired in the Union Pacific Boilers shall not exceed 1 pound of sulfur per million Btu fired (ARM 17.8.322).

C.3. Unless otherwise specified by rule or in this permit, Sidney Sugars shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel burning equipment and new fuel burning equipment calculated using the following equations (ARM 17.8.309):

For existing fuel burning equipment (installed before November 23, 1968) - Union Pacific Boiler #3 (EU003): $E = 0.882 * H^{-0.1664}$

For new fuel burning equipment (installed on or after November 23, 1968 - Union Pacific Boiler #4 (EU005): $E = 1.026 * H^{-0.233}$

Where H is the heat input capacity in million BTU (MMBtu) per hour and E is the maximum allowable particulate emissions rate in pounds per MMBtu.

C.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the #3 Union Pacific Boiler (EU003), emissions that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

C.5. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the #4 Union Pacific Boiler (EU005), emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

C.6. In the event Sidney Sugars burns fuels other than natural gas, except during gas curtailment and supply emergencies or for periodic testing, the source shall comply will all applicable requirements of 40 CFR 63, Subpart JJJJJJ - NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers. These regulations shall apply, as appropriate (ARM 17.8.342 and 40 CFR 63, Subpart JJJJJJ).

Compliance Demonstration

C.7. Monitoring compliance with the sulfur content requirement (gaseous) of Section III.C.1, the particulate limitations of Section III.C.3, and the opacity limitations of Section III.C.4 and III.C.5 may be demonstrated by burning pipeline quality natural gas on an ongoing basis. Sidney Sugars shall record any instance in which fuel other than pipeline quality natural gas is burned. Emissions of all regulated pollutants during any time that pipeline quality natural gas is not burned shall be calculated and submitted to the Department (ARM 17.8.1213).

C.8. In the event Sidney Sugars burns fuel oil in the boilers monitoring compliance with the sulfur content requirement of Section III.C.2, may be satisfied by obtaining for each shipment, a certification from the supplier or providing a laboratory analysis, that demonstrates the sulfur content does not exceed 1 pound per million Btu of fuel oil burned (ARM 17.8.749 and ARM 17.8.1213).

C.9. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.C.3 (ARM 17.8.749 and ARM 17.8.1213).

C.10. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 9 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.C.4 and III.C.5 (ARM 17.8.749 and ARM 17.8.1213).

C.11. In the event Sidney Sugars burns fuels other than natural gas, except during gas curtailment and supply emergencies or for periodic testing, the source shall meet the requirement for demonstration of compliance and testing procedures of 40 CFR 63, Subpart JJJJJJ - Industrial, Commercial, and Institutional Boilers, as applicable (ARM 17.8.342 and 40 CFR 63, Subpart JJJJJJ).

Recordkeeping

C.12. In the event any fuel, other than natural gas is burned, Sidney Sugars shall maintain a log on site that contains the date, time, number of hour's the fuel oil was burned, the type and quantity of fuel fed, identification of the boiler(s) in which the fuel was burned, and operator's initials (ARM 17.8.1212).

C.13. Sidney Sugars shall maintain on site the supplier's certification or laboratory analysis as required in Section III.C.8 (ARM 17.8.1212).

C.14. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

C.15. Sidney Sugars shall comply with all applicable record keeping requirements in accordance with 40 CFR 63, Subpart JJJJJJ, as applicable (ARM.8.342 and 40 CFR 63, Subpart JJJJJJ).

Reporting

C.16. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

C.17. Sidney Sugars shall comply with all applicable reporting requirements in accordance with 40 CFR 63, Subpart JJJJJJ, as applicable (ARM.8.342 and 40 CFR 63, Subpart JJJJJJ).

C.18. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

C.19. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.C.1 through III.C.5 and any deviation from the requirements to Section III.C.6;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.C.7 through III.C.11;

c. A summary of any deviation from compliance with recordkeeping requirements as established by Section III.C.12 through III.C.15; and

d. A summary of any reports submitted in accordance with Section III.C.17.

D. EU007: Superior Mohawk Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirement
D.1, D.5, D.13, D.14	Natural Gas Sulfur Content	50 Grains/100 Cubic Feet	Burning Pipeline Quality Natural Gas	Ongoing	Semiannual
D.2, D.5, D.6, D.9, D.11, D.13, D.14	Particulate Matter	$E = 0.882 * H^{-0.1664}$	Burning Pipeline Quality Natural Gas	Ongoing	
			Method 5	As Required by Department and Section III.A.1	
D.3, D.5, D.7, D.9, D.11, D.13, D.14	Opacity	20%	Burning Pipeline Quality Natural Gas	Ongoing	
			Method 9	As Required by Department and Section III.A.1	
D.4, D.8, D.10, D.12, D.13, D.14	As Required by 40 CFR 60, Subpart Dc	As Required by 40 CFR 60, Subpart Dc	As Required by 40 CFR 60, Subpart Dc	As Required by 40 CFR 60, Subpart Dc	As Required by 40 CFR 60, Subpart Dc

Conditions

D.1. The sulfur content of the natural gas fired in the Superior Mohawk boiler shall not exceed 50 grains per 100 cubic feet of gaseous fuel (ARM 17.8.749).

D.2. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Superior Mohawk boiler, particulate matter in excess of that allowed by $E = 0.882 * H^{-0.1664}$, where H is the heat input capacity in MMBtu per hour and E is the maximum allowable particulate emissions rate in pounds per MMBtu (ARM 17.8.309).

D.3. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Superior Mohawk boiler, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

D.4. Sidney Sugars shall comply will all applicable requirements of 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. These regulations shall apply, as appropriate (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

Compliance Demonstration

D.5. Monitoring compliance with the sulfur content requirement (gaseous) of Section III.D.1, the particulate limitations of Section III.D.2, and the opacity limitations of Section III.D.3 shall be demonstrated by burning only pipeline quality natural gas on an ongoing basis. (ARM 17.8.1213).

D.6. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.D.2 (ARM 17.8.749 and ARM 17.8.1213).

D.7. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 9 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.D.3 (ARM 17.8.749 and ARM 17.8.1213).

D.8. Sidney Sugars shall meet the requirement for demonstration of compliance and testing procedures of 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as applicable (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

Recordkeeping

D.9. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

D.10. Sidney Sugars shall comply with all applicable recordkeeping requirements in accordance with 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as applicable (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

Reporting

D.11. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

D.12. Sidney Sugars shall comply with all applicable reporting requirements in accordance with 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as applicable (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

D.13. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements.

D.14. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.D.1 through III.B.3 and any deviation from the requirements to Section III.D.4;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.D.5 through III.D.8;

c. A summary of any deviation from compliance with recordkeeping requirements as established by Section III.D.9 and III.D.10; and

d. A summary of any reports submitted in accordance with Section III.D.12.

E. EU022: Coal Handling and Storage

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
E.1, E.6, E.10, E.16, E.17	Baghouse	Operate and Maintain	Inspection and Log	Weekly and During Any Maintenance	Semiannual
E.2, E.6, E.10, E.16, E.17	Covered External Conveyors				
E.3, E.6, E.8, E.10, E.12, E.14, E.16, E.17	Particulate Matter	0.01 gr/dscf	Method 5	As Required by Department and Section III.A.1	
E.4, E.6, E.7, E.10, E.11, E.12, E.14, E.16, E.17	Opacity	20%	Visual Survey	Weekly When the System is Operated	
			Method 9	As Required by the Department and Section III.A.1	
E.5, E.9, E.13, E.15, E.16, E.17	As Required by 40 CFR 60, Subpart Y	As Required by 40 CFR 60, Subpart Y	As Required by 40 CFR 60, Subpart Y	As Required by 40 CFR 60, Subpart Y	As Required by 40 CFR 60, Subpart Y

Conditions

E.1. Sidney Sugars shall install, operate and maintain a baghouse filter on the coal handling, conveying, screening and crushing system (ARM 17.8.752).

E.2. Sidney Sugars shall install and maintain covers on the external coal conveyors to maximize capture of emissions from the conveyors (ARM 17.8.752).

E.3. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the baghouse controlling the coal handling, conveying, screening and crushing system, particulate matter in excess of 0.01 gr/dscf (ARM 17.8.749).

E.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the baghouse controlling the coal handling and storage, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

E.5. Sidney Sugars shall comply will all applicable requirements of 40 CFR 60, Subpart Y - Standards of Performance for Coal Preparation and Processing Plants. These regulations shall apply, as appropriate (ARM 17.8.340 and 40 CFR 60, Subpart Y).

Compliance Demonstration

E.6. Sidney Sugars shall inspect the baghouse and conveyor enclosures weekly to ensure proper operation and maintenance, and to monitor compliance with the particulate and opacity limitations. A log of inspection and any maintenance activities shall be maintained that includes the following parameters (ARM 17.8.1213):

a. Date and time of log entry;

b. Name and initials of individual(s) entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Summary of maintenance activities occurring.

E.7. Sidney Sugars shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the baghouse. Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the baghouse for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the baghouse for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

E.8. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual, on the baghouse to monitor compliance with Section III.E.3 (ARM 17.8.1213).

E.9. Sidney Sugars shall meet the requirement for demonstration of compliance and testing procedures of 40 CFR 60, Subpart Y - Standards of Performance for Coal Preparation and Processing Plants, as applicable (ARM 17.8.340 and 40 CFR 60, Subpart Y).

Recordkeeping

E.10. Sidney Sugars shall maintain on site the inspection and maintenance log as specified in Section III.E.6 (ARM 17.8.1212).

E.11. If visual surveys are performed, Sidney Sugars shall maintain a log to verify that the visual surveys were performed as specified in Section III.E.7. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time date, observer's initials, and any preventative or correction action taken must be recorded in the log (ARM 17.8.1212).

E.12. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

E.13. Sidney Sugars shall comply with all applicable record keeping requirements in accordance with 40 CFR 60, Subpart Y - Standards of Performance for Coal Preparation and Processing Plants, as applicable (ARM 17.8.340 and 40 CFR 60, Subpart Y).

Reporting

E.14. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

E.15. Sidney Sugars shall comply with all applicable reporting requirements in accordance with 40 CFR 60, Subpart Y - Standards of Performance for Coal Preparation and Processing Plants, as applicable (ARM 17.8.340 and 40 CFR 60, Subpart Y).

E.16. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

E.17. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.E.3 and III.E.4 and any deviation from the requirements to Section III.E.1, III.E.2 and III.E.5;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.E.6 through III.E.9;

c. A Summary of any malfunction(s) of the controls required by Section III.E.1 and III.E.2 and associated corrective action taken;

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.E.10 through III.E.13; and

e. A summary of any reports submitted in accordance with Section III.E.15.

F. EU024A&B and EU025A&B: Stearns-Roger Pulp Dryers

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
F.1, F.8, F.18, F.21, F.22	Fuel	Natural Gas, Except During Emergency Curtailment	Log, Curtailment Fuel Used	As Necessary	Semiannual
F.2, F.9, F.17, F.21, F.22	Natural Gas Sulfur Content	50 gr/100 Cubic Feet	Burning Pipeline Quality Natural Gas	Ongoing	
F.3, F.10, F.17, F.21, F.22	Fuel Oil Sulfur Content	1 lb/MMBtu Fired	Supplier's Certification or Fuel Analysis	As Necessary	
F.4, F.11, F.12, F.13, F.16, F.18, F.20, F.21, F.22	Opacity	40%	Visual Survey	Weekly When the System is Operated	
			Method 9	As Required by Department and Section III.A.1	
			Operate, Maintain, and Inspect Cyclone(s)	Ongoing	
F.5, F.13, F.18, F.21, F.22	Weigh Device	Operate and Maintain	Log	Daily and During Any Maintenance	
F.6, F.14, F.18, F.21, F.22	Process Rate	114,192 ton/campaign	Log	Daily	
			Weigh Device	Ongoing	
F.7, F.11, F.15, F.18, F.19, F.20, F.21, F.22	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	Every 4 Years	
			Operate, Maintain, and Inspect Cyclone(s)	Ongoing	

Conditions

F.1. Each dryer is limited to burning natural gas only, except during emergency curtailment situations (ARM 17.8.749).

F.2. The sulfur content of the natural gas fired in the dryers shall not exceed 50 grains per 100 cubic feet of gaseous fuel (ARM 17.8.322).

F.3. The sulfur content of the fuel oil fired in the dryers shall not exceed one pound of sulfur per million Btu of fuel oil fired (ARM 17.8.322).

F.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from each pulp dryer's cyclone, emissions that exhibit an opacity of 40% or greater, averaged over 6 consecutive minutes (ARM 17.8.304).

F.5. Sidney Sugars shall install, operate and maintain a weighing device on each dryer to verify the process rate and to monitor compliance with the process rate limitation required by Section III.F.6. In the event of weigh device malfunction, Sidney Sugars shall use an alternative monitoring method approved by the Department (ARM 17.8.749).

F.6. Each dryer process rate (to include molasses) shall not exceed 114,192 tons during any one campaign (ARM 17.8.749).

F.7. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from each pulp dryer (#1 and #2), particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

F.8. Sidney Sugars shall record in a log the type of fuel burned in the dryers. Anytime fuel other than pipeline quality natural gas is combusted in the dryers, the log must detail the date, time and number of hour's fuel oil was burned, the type and quantity of fuel oil fed, emitting unit number of the dryer(s) in which the fuel oil was burned, and operator's initials (ARM 17.8.1213).

F.9. Monitoring compliance with the sulfur content requirement (gaseous) of Section III.F.2, may be satisfied by burning pipeline quality natural gas on an ongoing basis (ARM 17.8.1213).

F.10. In the event the dyers combust fuel oil, monitoring compliance with the sulfur content requirement of Section III.F.3 may be satisfied by obtaining for each shipment, a certification from the supplier or providing a laboratory analysis, that demonstrates the sulfur content does not exceed 1 pound per million Btu of fuel oil burned (ARM 17.8.749 and ARM 17.8.1213).

F.11. Sidney Sugars shall operate and maintain the Stearn-Roger, Inc. and MAC Equipment cyclones in accordance with manufacturer's procedures to minimize emissions and monitor compliance with the particulate and opacity standards. Sidney Sugars shall inspect the cyclones weekly. A log of inspection and any maintenance activities shall be maintained that includes the following parameters (ARM 17.8.1213):

a. Date and time of log entry;

b. Name and initials of individual(s) entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Summary of maintenance activities occurring.

F.12. Sidney Sugars shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the pulp dryer cyclone(s). Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the cyclones for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 30% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the cyclones for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 40% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

F.13. Monitoring compliance with Section III.F.5 may be satisfied by daily inspections and maintenance as necessary of the weigh device. Maintenance shall include, but is not limited to, performing annual certification of accuracy on the weigh device. Sidney Sugars shall document daily inspections and all maintenance activities in a log (ARM 17.8.1213).

F.14. Sidney Sugars shall maintain a daily summary log of the amount of pulp processed in the dryers. This number shall be determined using the weigh device. In the event of weigh device malfunction, Sidney Sugars shall use an alternative monitoring method approved by the Department. The daily summary log shall be totaled every month and added to the previous months of the campaign to monitor compliance with the campaign process rate limitation as stated in Section III.F.6 (ARM 17.8.1213).

F.15. Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual, on the pulp dryers every four (4) years to monitor compliance with Section III.F.7 (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

F.16. If visual surveys are performed, Sidney Sugars shall maintain a log to verify that the visual surveys were performed as specified in Section III.F.12. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

F.17. Sidney Sugars shall maintain on-site the supplier's certification or laboratory analysis to monitor compliance with Section III.F.10 (ARM 17.8.1212).

F.18. Sidney Sugars shall maintain on site the fuel log, inspection and maintenance log, and process rate log on site, required in Section III.F.8, III.F.11, III.F.13, and III.F.14 (ARM 17.8.1212).

F.19. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

F.20. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

F.21. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

F.22. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.F.2, III.F.3, III.F.4, III.F.6 and III.F.7 and any deviation from the requirements to Section III.F.1 and III.F.5;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.F.8 through III.F.15;

c. A summary of any malfunction(s) of the equipment required by Section III.F.5 and III.F.11 and associated corrective action taken; and

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.F.16 through III.F.19.

G. EU026A&B: Dry Pulp Handling Cyclone

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
G.1, G.3, G.4, G.6, G.7, G.8, G.9, G.10, G.11	Opacity	20%	Visual Surveys	Weekly When the System is Operated	Ongoing
			Method 9	As Required by Department and Section III.A.1	
			Operate, Maintain, and Inspect Cyclone	Ongoing	
G.2, G.3, G.5, G.6, G.8, G.9, G.10, G.11	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department and Section III.A.1	
			Operate, Maintain, and Inspect Cyclone	Ongoing	

Conditions

G.1. Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308).

G.2. Sidney Sugars shall not cause, suffer, allow, or permit to be discharged into the atmosphere, from the dry pulp handling cyclone, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

G.3. Sidney Sugars shall operate and maintain the MAC Equipment dry pulp handling cyclone in accordance with manufacturer's procedures to minimize emissions and monitor compliance with the particulate and opacity standards. Sidney Sugars shall inspect the cyclone weekly. A log of inspection and any maintenance activities shall be maintained that includes the following parameters (ARM 17.8.1213):

a. Date and time of log entry;

b. Name and initials of individual(s) entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Summary of maintenance activities occurring.

G.4. Sidney Sugars shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the pulp handling cyclone stack(s). Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the cyclone for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the cyclone for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

G.5. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.G.2 (ARM 17.8.1213).

Recordkeeping

G.6. Sidney Sugars shall maintain on site the inspection and maintenance log required in Section III.G.3 (ARM 17.8.1212).

G.7. If visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.G.4. Each log entry must include the date, time, results of the survey, (and results of subsequent Method 9, if applicable), and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

G.8. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

G.9. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

G.10. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

G.11. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any deviation or exceedance of the limits established within Section III.G.1 and III.G.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.G.3 through III.G.5;

c. A summary of any malfunction(s) of the equipment required by Section III.G.3 and associated corrective action taken; and

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.G.6 through III.G.8.

H. EU030: Pellet Mills and Cooler Cyclone

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
H.1, H.3, H.4, H.6, H.7, H.8, H.9, H.10, H.11	Opacity	20%	Visual Surveys	Weekly When the System is Operated	Semiannual
			Method 9	As Required by Department and Section III.A.1	
			Operate, Maintain, Inspect Cyclone	Ongoing	
H.2, H.3, H.5, H.6, H.8, H.9, H.10, H.11	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department and Section III.A.1	
			Operate, Maintain, and Inspect Cyclone	Ongoing	

Conditions

H.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the pellet mills and cooler, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

H.2. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the pellet mills and cooler cyclone, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

H.3. Sidney Sugars shall operate and maintain the MAC Equipment pellet mills and cooler cyclone in accordance with manufacturers' procedures to minimize emissions and monitor compliance with the particulate and opacity standards (ARM 17.8.1213). Sidney Sugars shall inspect the cyclone weekly. A log of inspection and any maintenance activities shall be maintained that includes the following parameters (ARM 17.8.1213):

a. Date and time of log entry;

b. Name and initials of individual(s) entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Summary of maintenance activities occurring.

H.4. Sidney Sugars shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the pellet mills and cooler cyclone stack. Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the source for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the source for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

H.5. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual, on the pellet mills and cooler cyclone stack to monitor compliance with Section III.H.2 (ARM 17.8.1213).

Recordkeeping

H.6. Sidney Sugars shall maintain on site the inspection and maintenance log required in Section III.H.3 (ARM 17.8.1212).

H.7. If visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.H.4. Each log entry must include the date, time, results of the survey, (and results of subsequent Method 9, if applicable), and the observer's

initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

H.8. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

H.9. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

H.10. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

H.11. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any deviation or exceedance of the limits established within Section III.H.1 and III.H.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.H.3 through III.H.5;

c. A summary of any malfunction(s) of the control equipment required by Section III.H.3 and associated corrective action taken; and

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.H.6 through III.H.8.

I. EU031: Pellet Tank Exhaust Fan

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
I.1, I.3, I.5, I.6, I.7, I.8, I.9	Opacity	20%	Visual Surveys	Weekly When the System is Operated	Semiannual
			Method 9	As Required by Department and Section III.A.1	
I.2, I.4, I.6, I.7, I.8, I.9	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department and Section III.A.1	

Conditions

I.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the pellet tank exhaust fan, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

I.2. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the pellet tank exhaust fan, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

I.3. Sidney Sugars shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the tank exhaust stack. Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the stacks for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the tank exhaust stack for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

I.4. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 test in accordance with the Montana Source Test Protocol and Procedures Manual on the pellet tank exhaust fan to monitor compliance with Section III.I.2 (ARM 17.8.1213).

Recordkeeping

I.5. If visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.I.3. Each log entry must include the date, time, results of the survey, (and results of subsequent Method 9, if applicable), and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

I.6. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

I.7. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

I.8. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

I.9. The semiannual monitoring report shall (ARM 17.8.1212):

a. A summary of any deviation or exceedance of the limits established within Section III.I.1 and III.I.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.I.3 and III.I.4; and

c. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.I.5 and III.I.6.

J. EU043A: Slaker Building Vent

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
J.1, J.6, J.11, J.15, J.16	Material Throughput	400 ton/day	Log	Each Shipment	Semiannual
J.2, J.7, J.11, J.15, J.16	MAC Equipment Baghouse	Operate and Maintain	Inspection and Log	Daily and During Any Maintenance	
J.3, J.8, J.11, J.15, J.16	Pneumatic Loading Device	Operate and Maintain	Observation and Log	During Any Loading	
J.4, J.7, J.9, J.12, J.13, J.14, J.15, J.16	Opacity	20%	Visual Surveys	Weekly When the System is Operated	
			Method 9	As Required by Department and Section III.A.1	
J.5, J.7, J.10, J.13, J.14, F.15, J.16	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department and Section III.A.1	

Conditions

J.1. The pebble lime hopper throughput shall not exceed 400 tons/day (ARM 17.8.752).

J.2. Sidney Sugars shall operate and maintain the existing MAC Equipment according to manufacturers' specifications and vent all emissions from the loading of the pebble lime hopper to the baghouse (ARM 17.8.752).

J.3. A pneumatic loading device shall be used when loading the pebble lime hopper (ARM 17.8.752).

J.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the slaker building vent, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

J.5. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the slaker building vent, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

J.6. Sidney Sugars shall maintain a log recording each delivery of pebble lime. The log shall contain the date, time, quantity of pebble lime being delivered, and initials of individual recording the delivery. Sidney Sugars shall calculate and record the average daily pebble lime hopper throughput, in tons, based on the total quantity of pebble lime delivered/received and total number of days operated during each campaign (ARM 17.8.1213).

J.7. Sidney Sugars shall inspect the baghouse and pebble lime hopper venting system, including any associated ductwork, daily. A log of inspection and any maintenance activities shall be maintained. The log shall contain the following parameters (ARM 17.8.1213):

a. Date and time of log entry;

b. Name and initials of individual(s) entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Summary of any maintenance activities occurring.

J.8. Sidney Sugars shall observe each pebble lime delivery truck to ensure use of a pneumatic loading device during any loading of the pebble lime hopper, to monitor compliance with Section III.J.3. The observations of delivery trucks shall be recorded in a log which provides the date, time, results of observations, and observers' initials (ARM 17.8.1213).

J.9. Sidney Sugars shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the pebble lime hopper stack. Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the pebble lime hopper stack for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the pebble lime hopper stack for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

J.10. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual, on the slaker building vent to monitor compliance with Section III.J.5 (ARM 17.8.1213).

Recordkeeping

J.11. Delivery logs/throughput records, inspection and maintenance logs, and observation logs shall be maintained on site as required by Section III.J.6, III.J.7 and III.J.8 (ARM 17.8.1212).

J.12. If visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.J.9. Each log entry must include the date, time, results of the survey, (and results of subsequent Method 9, if applicable), and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

J.13. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

J.14. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

J.15. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

J.16. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.J.1, III.J.4 and III.J.5 and any deviation from the requirements to Section III.J.2 and III.J.3;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.J.6 through III.J.10;

c. A summary of any malfunction(s) of the equipment required by Section III.J.2 and III.J.3 and associated corrective action taken; and

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.J.11 through III.J.13.

K. EU020: Granulators

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
K.1, K.3, K.4, K.6, K.7, K.8, K.9, K.10,	Opacity	20%	Method 9	As Required by Department and Section III.A.1	Semiannual
			Operate and Maintain Wet Scrubber	Ongoing	
K.2, K.3, K.5, K.6, K.7, K.8, K.9, K.10,	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department and Section III.A.1	
			Operate and Maintain Wet Scrubber	Ongoing	

Conditions

K.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the granulator-wet scrubber, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

K.2. Sidney Sugars shall not cause, suffer, allow, or permit to be discharged into the atmosphere, from the granulator-wet scrubbers, particulate matter in excess of the amount allowed by ARM 17.8.310. The following equations shall be used to calculate the values (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

K.3. Sidney Sugars shall operate and maintain the granulator-wet scrubber in accordance with manufacturer's procedures to minimize emissions and monitor compliance with the particulate and opacity limitations. Sidney Sugars shall inspect the granulator-wet scrubber daily. A log of inspections and any maintenance activities shall be maintained that includes the following parameters (ARM 17.8.1213):

a. Date and time of log entry;

b. Initials of individual(s) entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Summary of maintenance activities occurring.

K.4. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 9 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.K.1 (ARM 17.8.749 and ARM 17.8.1213).

K.5. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 test in accordance with the Montana Source Test Protocol and Procedures Manual on the granulator wet scrubber stacks to monitor compliance with Section III.K.2 (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

K.6. Sidney Sugars shall maintain a log on site as required by Section III.K.3 (ARM 17.8.1212).

K.7. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

K.8. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

K.9. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

K.10. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any deviation or exceedance of the limits established within Section III.K.1 and III.K.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.K.3 through III.K.5;

c. A summary of any malfunction(s) of the control equipment required by Section III.K.3 and associated corrective action taken; and

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.K.6 and III.K.7.

L. EU027: Weibul Conditioner System

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
L.1, L.3, L.4, L.6, L.7, L.8, L.9, L.10	Opacity	20%	Operate Baghouse; Maintain and Inspect Baghouse	Ongoing; Daily and During Any Maintenance	Semiannual
			Method 9	As Required by Department and Section III.A.1	
L.2, L.3, L.5, L.6, L.7, L8, L.9, L.10	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Operate Baghouse; Maintain and Inspect Baghouse	Ongoing; Daily and During Any Maintenance	
			Method 5	As Required by Department and Section III.A.1	

Conditions

L.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Weibul conditioner vent, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

L.2. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the Weibul conditioner vent, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):
For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

L.3. Sidney Sugars shall operate and maintain a baghouse on the Weilbul conditioner in accordance with manufacturer's procedures to minimize emissions and monitor compliance with the particulate and opacity limitations. Sidney Sugars shall inspect the baghouse daily. A log of inspections and any maintenance activities shall be maintained that includes the following parameters (ARM 17.8.1213):

a. Date and time of log entry;

b. Initials of the individual entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Summary of any maintenance activities occurring

L.4. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 9 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.C.1 (ARM 17.8.1213).

L.5. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.C.2 (ARM 17.8.1213).

Recordkeeping

L.6. Sidney Sugars shall maintain on site the inspection and maintenance log as required by Section III.L.4 (ARM 17.8.1212).

L.7. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

L.8. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

L.9. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

L.10. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any deviation or exceedance of the limits established within Section III.L.1 and III.L.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.L.3 through III.L.6;

c. A summary of any malfunction(s) of the equipment required by Section III.L.3 and associated corrective action taken; and

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.L.6 and III.L.7.

M. EU028: Hoffman Vent

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
M.1, M.3, M.5, M.6, M7, M.8, M.9	Opacity	20%	Visual Surveys	Weekly When the System is Operated	Semiannual
			Method 9	As Required by Department and Section III.A.1	
M.2, M.4, M.6, M.7, M.8, M.9	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department and Section III.A.1	

Conditions

M.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Hoffman vent, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

M.2. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the Hoffman vent, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

M.3. Sidney Sugars shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the Hoffman Vent Baghouse. Under the visual survey option, once per calendar week, during daylight hours, Sidney Sugars shall visually survey the baghouse for any visible emissions. If visible emissions are observed during the visual survey, Sidney Sugars must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.1213).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Sidney Sugars shall perform the Method 9 source tests on the source for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

M.4. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.M.2 (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

M.5. If visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.M.3. Each log entry must include the date, time, results of the survey, (and results of subsequent Method 9, if applicable), and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

M.6. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

M.7. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

M.8. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

M.9. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any deviation or exceedance of the limits established within Section III.M.1 and III.M.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.M.3 and III.M.4; and

c. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.M.5 and III.M.6.

N. EU047-056: Sugar Silos (#7 through #16)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
N.1, N.6, N.9, N.12, N.13	Filter Vent	Operate and Maintain	Inspect and Maintain	Monthly and During Any Maintenance	Semiannual
N.2, N.6, N.9, N.12, N.13	Connection Between Silo #6 and #7				
N.3, N.6, N.9, N.12, N.13	Conveyor and Elevator Enclosures				
N.4, N.6, N.7, N.10, N.11, N.12, N.13	Opacity	10%	Method 9	As Required by Department and Section III.A.1	
			Operate and Maintain Controls	Ongoing	
N.5, N.6, N.8, N.10, N.11, N.12, N.13,	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department and Section III.A.1	
			Operate and Maintain Controls	Ongoing	

Conditions

N.1. Sidney Sugars shall install, operate and maintain a filter vents on sugar silos #7 through #16 (ARM 17.8.752).

N.2. Sidney Sugars shall install, operate and maintain a connection between conditioner silo #6 and silo #7 to control emissions from silo #6 through the silo #7 filter vent (ARM 17.8.752).

N.3. Sidney Sugars shall install, operate and maintain enclosed screw conveyors and enclosed bucket elevators used to transfer sugar (ARM 17.8.752).

N.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from each of the sugar silos (#7 through #16), visible emissions in excess of 10% opacity averaged over 6 consecutive minutes (ARM 17.8.752).

N.5. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the sugar silo vents, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

N.6. Sidney Sugars shall inspect, monthly, the filter vents, the connectors between silos #6 and #7, and the conveyors and bucket elevator enclosures to ensure proper operation and maintenance, and to monitor compliance with the particulate and opacity limitations. A log of inspection and any maintenance activities shall be maintain that includes the following parameters (ARM 17.8.1213):

a. Date and Time of log entry;

b. Initials of individual(s) entering information in the log;

c. Results of inspection and any corrective action taken; and

d. Any maintenance activities occurring or corrective action taken; and

N.7. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 9 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.N.4 (ARM 17.8.749 and ARM 17.8.1213).

N.8. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.N.5 (ARM 17.8.749 and ARM 17.8.1213).

Recordkeeping

N.9. Sidney Sugars shall maintain on site the inspection and maintenance log on site as required by Section III.N.6 (ARM 17.8.1212).

N.10. All compliance test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

N.11. Any compliance source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

N.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements.

N.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.N.4 and III.N.5 and any deviation from the requirements to Section III.N.1 through III.N.3;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.N.6 through III.N.8;

c. A summary of any malfunction(s) of the equipment required by Section III.N.1 through III.N3 and associated corrective action taken; and

d. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.N.9 through III.N.10.

O. EU101: Beet Unloading and Handling, EU102: Coal Unloading, EU103: Coke Unloading and Handling, and EU104: Lime Unloading and Handling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
O.1, O.3, O.4, O.5, O.6, O.7	Opacity	20%	Visual Surveys	Weekly	Semiannual
O.2, O.4, O.5, O.6, O.7	Opacity	Reasonable Precaution	Preventative or Corrective Action	As Necessary	

Conditions

O.1. Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308(1)).

O.2. Sidney Sugars shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308(2)).

Compliance Demonstration

O.3. Once per calendar week, during daylight hours, Sidney Sugars shall visually survey the unloading and handling activities for any sources of excessive emissions. If visible emissions are observed during the visual survey, Sidney Sugars shall immediately take corrective action to contain or

minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.101(27) and ARM 17.8.1213).

O.4. Sidney Sugars shall treat all unpaved portions of the access roads, parking lots, storage areas, and the general plant area with fresh water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precaution limitation (ARM 17.8.749).

Recordkeeping

O.5. Sidney Sugars shall maintain on site a weekly log recording the results of the visual surveys. The log shall include, but is not limited to, the date, time, observer(s), the area being surveyed, and the results of the visual survey(s). If any preventative or corrective action is required, the time, date, and a description of the action taken must be included in the log. The log shall be maintained as a permanent business record for at least five years following the activity. The log shall be available to the Department for inspection and must be submitted to the Department upon request (ARM 17.8.1212).

Reporting

O.6. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements.

O.7. The semiannual monitoring reports shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.O.1 and any deviation from the requirements to Section III.O.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.O.3 and III.O4; and

c. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.O.5.

P. EU500: Haul Roads

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
P.1, P.3, P.5, P.6, P.7	Opacity	20%	Visual Surveys	Weekly	Semiannual
P.2, P.4, P.5, P.6, P.7	Airborne Particulate Matter	Reasonable Precaution	Preventative or Corrective Action	As Necessary	

Conditions

P.1. Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Sidney Sugars shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibits an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308(1)).

P.2. Sidney Sugars shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308(2)).

Compliance Demonstration

P.3. Once per calendar week, during daylight hours, Sidney Sugars shall visually survey haul roads for any sources of excessive emissions. If visible emissions are observed during the visual survey, Sidney Sugars shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of the liability for a violation determined using Method 9 (ARM 17.8.101(27) and ARM 17.8.1213).

P.4. Sidney Sugars shall treat all unpaved portions of the access roads, parking lots and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions and 20% opacity limitations (ARM 17.8.749).

Recordkeeping

P.5. Sidney Sugars shall maintain on site a weekly log recording the results of the visual surveys. The log shall include, but is not limited to, the date, time, observer(s), the area being surveyed, and the results of the visual survey(s). If any preventative or corrective action is required, the time, date, and a description of the action taken must be included in the log. The log shall be maintained as a permanent business record for at least five years following the activity. The log shall be available to the Department for inspection and must be submitted to the Department upon request (ARM 17.8.1212).

Reporting

P.6. The annual compliance certification report required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

P.7. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of any exceedance of the limits established within Section III.P.1 and any deviation from the requirements of Section III.P.2;

b. A summary of any deviation from the established compliance demonstrations as specified by Section III.P.3 and III.P.4; and

c. A summary of any deviation from compliance with the recordkeeping requirements as established by Section III.P.5.

SECTION IV NON-APPLICABLE REQUIREMENTS

Air Quality Administrative Rules of Montana (ARM) and Federal Regulations identified as not applicable to the facility or to a specific emission unit at the time of the permit issuance are listed below (ARM 17.8.1214). The following list does not preclude the need to comply with any new requirements that may become applicable during the permit term.

A. Facility-Wide

The following table contains non-applicable requirements that are administrated by the Air Resources Management Bureau of the Department of Environmental Quality.

State Rule Citation	Reason
ARM 17.8.809-824 ARM 17.8.827	These rules do not apply because no changes have been made at the facility that would trigger these procedural requirements.
ARM 17.8.610 ARM 17.8.323 ARM 17.8.321	These rules do not apply because this facility is not in this source category.
ARM 17.8.316 ARM 17.8.320	These rules do not apply because facility does not have these emission units.

Federal Rule Citation	Reason
40 CFR 60.7 40 CFR 60.8 40 CFR 60.11 40 CFR 60.13 40 CFR 60.14 40 CFR 60.15 40 CFR 60.18	These rules do not apply because no changes have been made at the facility that would trigger these requirements.
40 CFR 60, Subpart C, Cb, Cc, Cd, Ce 40 CFR 60, Subpart E-J 40 CFR 60, Subpart L-X 40 CFR 60, Subpart Z 40 CFR 60, Subpart AA-EE 40 CFR 60, Subpart GG-HH 40 CFR 60, Subpart KK-NN 40 CFR 60, Subpart PP-XX 40 CFR 60, Subpart AAA-BBB 40 CFR 60, Subpart DDD 40 CFR 60, Subpart FFF-LLL 40 CFR 60, Subpart NNN-WWW 40 CFR 60, Subpart AAAA-FFFF 40 CFR 60, Subpart HHH-MMMM 40 CFR 61, Subpart B-F 40 CFR 61, Subpart H-L 40 CFR 61, Subpart N-R 40 CFR 61, Subpart T 40 CFR 61, Subpart V-W 40 CFR 61, Subpart Y 40 CFR 61, Subpart BB 40 CFR 61, Subpart FF	These requirements are not applicable because the facility is not an affected source as defined in these regulations.
40 CFR 68	These requirements are not applicable because this facility does not have emission units or regulated substance as defined in these regulations.
40 CFR 72-78	These requirements are not applicable because this facility is not in this source category.

B. Emission Units

The permit application identified applicable requirements; non-applicable requirements for individual or specific emission units were not listed. The Department has listed all non-applicable requirements in Section IV.A; these requirements relate to each specific unit as well as facility wide.

SECTION V GENERAL PERMIT CONDITIONS

A. Compliance Requirements

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(a)-(c)&(e), §1206(6)(b)&(c)

1. The permittee must comply with all conditions of the permit. Any noncompliance with the terms or conditions of the permit constitutes a violation of the Montana Clean Air Act, and may result in enforcement action, permit modification, revocation and reissuance, or termination, or denial of a permit renewal application under ARM Title 17, Chapter 8, Subchapter 12.

2. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. If appropriate, this factor may be considered as a mitigating factor in assessing a penalty for noncompliance with an applicable requirement if the source demonstrates that both the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations, and that such health, safety or environmental impacts were unforeseeable and could not have otherwise been avoided.

4. The permittee shall furnish to the Department, within a reasonable time set by the Department (not to be less than 15 days), any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of those records that are required to be kept pursuant to the terms of the permit. This subsection does not impair or otherwise limit the right of the permittee to assert the confidentiality of the information requested by the Department, as provided in 75-2-105, MCA.

5. Any schedule of compliance for applicable requirements with which the source is not in compliance with at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it was based.

6. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed plan or schedule is required by the applicable requirement or the Department.

B. Certification Requirements

ARM 17.8, Subchapter 12, Operating Permit Program §1207 and §1213(7)(a)&(c)-(d)

1. Any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12, shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

2. Compliance certifications shall be submitted by February 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. Each certification must include the required information for the previous calendar year (i.e., January 1 – December 31).

3. Compliance certifications shall include the following:

   a. The identification of each term or condition of the permit that is the basis of the certification;

   b. The identification of the method(s) or other means used by the owner or operator for determining the status of compliance with each term and condition during the certification period, consistent with ARM 17.8.1212;

   c. The status of compliance with each term and condition for the period covered by the certification, including whether compliance during the period was continuous or intermittent (based on the method or means identified in ARM 17.8.1213(7)(c)(ii), as described above); and

   d. Such other facts as the Department may require to determine the compliance status of the source.

4. All compliance certifications must be submitted to the Environmental Protection Agency, as well as to the Department, at the addresses listed in the Notification Addresses Appendix of this permit.

C. Permit Shield

ARM 17.8, Subchapter 12, Operating Permit Program §1214(1)-(4)

1. The applicable requirements and non-federally enforceable requirements are included and specifically identified in this permit and the permit includes a concise summary of the requirements not applicable to the source. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements and any non-federally enforceable requirements as of the date of permit issuance.

2. The permit shield described in 1 above shall remain in effect during the appeal of any permit action (renewal, revision, reopening, revocation or re-issuance) to the Board of Environmental Review (Board) until such time as the Board renders its final decision.

3. Nothing in this permit alters or affects the following:

   a. The provisions of Sec. 7603 of the FCAA, including the authority of the administrator under the section;

   b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

   c. The applicable requirements of the Acid Rain Program, consistent with Sec. 7651g(a) of the FCAA;

   d. The ability of the administrator to obtain information from a source pursuant to Sec. 7414 of the FCAA;

   e. The ability of the Department to obtain information from a source pursuant to the Montana Clean Air Act, Title 75, Chapter 2, MCA;

   f. The emergency powers of the Department under the Montana Clean Air Act, Title 75, Chapter 2, MCA; and

g. The ability of the Department to establish or revise requirements for the use of Reasonably Available Control Technology (RACT) as defined in ARM Title 17, Chapter 8. However, if the inclusion of a RACT into the permit pursuant to ARM Title 17, Chapter 8, Subchapter 12 is appealed to the Board, the permit shield as it applies to the source's existing permit shall remain in effect until such time as the Board has rendered its final decision.

4. Nothing in this permit alters or affects the ability of the Department to take enforcement action for a violation demonstrated pursuant to ARM 17.8.106, Source Testing Protocol.

5. Pursuant to ARM 17.8.132, for the purpose of submitting a compliance certification, nothing in these rules shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance. However, when compliance or noncompliance is demonstrated by a test or procedure provided by permit or other applicable requirements, the source shall then be presumed to be in compliance or noncompliance unless that presumption is overcome by other relevant credible evidence.

6. The permit shield will not extend to minor permit modifications or changes not requiring a permit revision (see sections I & J).

7. The permit shield will extend to significant permit modifications and transfer or assignment of ownership (see Sections K & O).

D. Monitoring, Recordkeeping, and Reporting Requirements
ARM 17.8, Subchapter 12, Operating Permit Program §1212(2)&(3)

1. Unless otherwise provided in this permit, the permittee shall maintain compliance monitoring records that include the following information:

   a. The date, place as defined in the permit, and time of sampling or measurements;

   b. The date(s) analyses were performed;

   c. The company or entity that performed the analyses;

   d. The analytical techniques or methods used;

   e. The results of such analysis; and

   f. The operating conditions at the time of sampling or measurement.

2. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All monitoring data, support information, and required reports and summaries may be maintained in a computerized form at the plant site if the information is made available to Department personnel upon request, which may be for either hard copies or computerized format. Strip-charts must be retained in their original form at the plant site and shall be made available to Department personnel upon request.

3. The permittee shall submit to the Department, at the addresses located in the Notification Addresses Appendix of this permit, reports of any required monitoring by February 15 and August 15 of each year, or more frequently if otherwise specified in an applicable requirement or

elsewhere in the permit. The monitoring report submitted on February 15 of each year must include the required monitoring information for the period of July 1 through December 31 of the previous year. The monitoring report submitted on August 15 of each year must include the required monitoring information for the period of January 1 through June 30 of the current year. All instances of deviations from the permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official, consistent with ARM 17.8.1207.

E. Prompt Deviation Reporting

ARM 17.8, Subchapter 12, Operating Permit Program §1212(3)(c)

The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. To be considered prompt, deviations shall be to the Department within the following timeframes (unless otherwise specified in an applicable requirement):

1. For deviations which may result in emissions potentially in violation of permit limitations:

   a. An initial phone notification (or faxed or electronic notification) describing the incident within 24 hours (or the next business day) of discover; and

   b. A follow-up written, faxed, or electronic report within 30 days of discovery of the deviation that describes the probable cause of the reported deviation and any corrective actions or preventative measures taken.

2. For deviations attributable to malfunctions, deviations shall be reported to the Department in accordance with the malfunction reporting requirements under ARM 17.8.110; and

3. For all other deviations, deviations shall be reported to the Department via a written, faxed, or electronic report within 90 days of discovery (as determined through routine internal review by the permittee).

Prompt deviation reports do not need to be resubmitted with regular semiannual (or other routine reports, but may be referenced by the date of submittal.

F. Emergency Provisions

ARM 17.8, Subchapter 12, Operating Permit Program §1201(13) and §1214(5), (6)&(8)

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of reasonable preventative maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates through properly signed, contemporaneous operating logs or other relevant evidence that:

   a. An emergency occurred and the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit; and

d. The permittee submitted notice of the emergency to the Department within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirements of ARM 17.8.1212(3)(c). This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

3. These emergency provisions are in addition to any emergency, malfunction or upset provision contained in any applicable requirement.

G. Inspection and Entry

ARM 17.8, Subchapter 12, Operating Permit Program §1213(3)&(4)

1. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department, the administrator or an authorized representative (including an authorized contractor acting as a representative of the Department or the administrator) to perform the following:

   a. Enter the premises where a source required to obtain a permit is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

   c. Inspect at reasonable times any facilities, emission units, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

   d. As authorized by the Montana Clean Air Act and rules promulgated thereunder, sample or monitor at reasonable times any substances or parameters at any location for the purpose of ensuring compliance with permit or applicable requirements; and

2. The permittee shall inform the inspector of all applicable workplace safety rules or requirements at the time of the inspection. This section shall not limit in any manner the Department's statutory right of entry and inspection as provided for in 75-2-403, MCA.

H. Fee Payment

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(f), and ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees §505(3)-(5) (STATE ONLY)

1. The permittee must pay application and operating fees, pursuant to ARM Title 17, Chapter 8, Subchapter 5.

2. Annually, the Department shall provide the permittee with written notice of the amount of the fee and the basis for the fee assessment. The air quality operation fee is due 30 days after receipt of the notice, unless the fee assessment is appealed pursuant to ARM 17.8.511. If any portion of the fee is not appealed, that portion of the fee that is not appealed is due 30 days after receipt of the notice. Any remaining fee, which may be due after completion of an appeal, is due immediately upon issuance of the Board's decision or upon completion of any judicial review of the Board's decision.

3. If the permittee fails to pay the required fee (or any required portion of an appealed fee) within 90 days after the due date of the fee, the Department may impose an additional assessment of 15% of the fee (or any required portion of an appealed fee) or $100, whichever is greater, plus interest on the fee (or any required portion of an appealed fee) computed at the interest rate established under 15-31-510(3), MCA.

I. Minor Permit Modifications

ARM 17.8, Subchapter 12, Operating Permit Program §1226(3)&(11)

1. An application for a minor permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion, and may reference any required information that has been previously submitted.

2. The permit shield under ARM 17.8.1214 will not extend to any minor modifications processed pursuant to ARM 17.8.1226.

J. Changes Not Requiring Permit Revisions

ARM 17.8, Subchapter 12, Operating Permit Program §1224(1)-(3), (5)&(6)

1. The permittee is authorized to make changes within the facility as described below, providing the following conditions are met:

   a. The proposed changes do not require the permittee to obtain an air quality preconstruction permit under ARM Title 17, Chapter 8, Subchapter 7;

   b. The proposed changes are not modifications under Title I of the FCAA, or as defined in ARM Title 17, Chapter 8, Subchapters 8, 9, or 10;

   c. The emissions resulting from the proposed changes do not exceed the emissions allowable under the permit, whether expressed as a rate of emissions or in total emissions;

   d. The proposed changes do not alter permit terms that are necessary to enforce applicable emission limitations on emission units covered by the permit; and

   e. The facility provides the administrator and the Department with written notification at least 7 days prior to making the proposed changes.

2. The permittee and the Department shall attach each notice provided pursuant to 1.e, above, to their respective copies of this permit.

3. Pursuant to the conditions above, the permittee is authorized to make Sec. 502(b)(10) changes, as defined in ARM Title 17.8.1201(30), without a permit revision. For each such change, the written notification required under 1.e above, shall include a description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

4. The permittee may make a change not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the following conditions are met:

   a. Each proposed change does not weaken the enforceability of any existing permit conditions;

   b. The Department has not objected to such change;

c. Each proposed change meets all applicable requirements and does not violate any existing permit term or condition; and

d. The permittee provides contemporaneous written notice to the Department and the administrator of each change that is above the level for insignificant emission units as defined in ARM 17.8.1201(22) and 17.8.1206(3), and the written notice describes each such change, including the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

5. The permit shield authorized by ARM 17.8.1214 shall not apply to changes made pursuant to ARM 17.8.1224(3) and ARM 17.8.1224(5), but is applicable to terms and conditions that allow for increases and decreases in emissions pursuant to ARM 17.8.1224(4).

K. Significant Permit Modifications
ARM 17.8, Subchapter 12, Operating Permit Program §1227(1), (3)&(4)

1. The modification procedures set forth in 2 below must be used for any application requesting a significant modification of this permit. Significant modifications include the following:

   a. Any permit modification that does not qualify as either a minor modification or as an administrative permit amendment;

   b. Every significant change in existing permit monitoring terms or conditions;

   c. Every relaxation of permit reporting or recordkeeping terms or conditions that limit the Department's ability to monitor compliance with any applicable rule, consistent with the requirements of the rule or

   d. Any other change determined by the Department to be significant

2. Significant modifications shall meet all requirements of ARM Title 17, Chapter 8, including those for applications, public participation, and review by affected states and the administrator, as they apply to permit issuance and renewal, except that an application for a significant modification permit need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion.

3. The permit shield provided for in ARM 17.8.1214 shall extend to significant modifications.

L. Reopening for Cause
ARM 17.8, Subchapter 12, Operating Permit Program §1228(1)&(2)

This permit may be reopened and revised under the following circumstances.

1. Additional applicable requirements under the FCAA become applicable to the facility when the permit has a remaining term of 3 or more years. Reopening and revision of the permit shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required under ARM 17.8.1228(1)(a) if the effective date of the applicable requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to ARM 17.8.1220(12) or 17.8.1221(2).

2. Additional requirements (including excess emission requirements) become applicable to an affected source under the Acid Rain Program. Upon approval by the administrator, excess emission offset plans shall be deemed to be incorporated into the permit.

3. The Department or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

4. The administrator or the Department determines that the permit must be revised or revoked and reissued to ensure compliance with the applicable requirements.

M. Permit, Expiration and Renewal

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(g), §1220(11)&(12), and §1205(2)(d)

1. This permit is issued for a fixed term of 5 years.

2. Renewal of this permit is subject to the same procedural requirements that apply to permit issuance, including those for applications, content, public participation, and affected state and administrator review.

3. Expiration of this permit terminates the permittee's right to operate unless a timely and administratively complete permit renewal application has been submitted consistent with ARM 17.8.1221 and 17.8.1205(2)(d). If a timely and administratively complete application has been submitted all terms and conditions of the permit, including the application shield, remain in effect after the permit expires until the permit renewal has been issued or denied.

4. For renewal, the permittee shall submit a complete air quality operating permit application to the Department not later than 6 months prior to the expiration of this permit, unless otherwise specified. If necessary to ensure that the terms of the existing permit will not lapse before renewal, the Department may specify in writing to the permittee a longer time period for submission of the renewal application. Such written notification must be provided at least 1 year before the renewal application due date established in the existing permit.

N. Severability Clause

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(i)&(l)

1. The administrative appeal or subsequent judicial review of the issuance by the Department of an initial permit under this subchapter shall not impair in any manner the underlying applicability of all applicable requirements, and such requirements continue to apply to the source as if a final permit decision had not been reached by the Department.

2. If any provision of a permit is found to be invalid, all valid parts that are severable from the invalid part remain in effect. If a provision of a permit is invalid in one or more of its applications, the provision remains in effect in all valid applications that are severable from the invalid applications.

O. Transfer or Assignment of Ownership

ARM 17.8, Subchapter 12, Operating Permit Program §1225(2)&(4)

1. If an administrative permit amendment involves a change in ownership or operational control, the applicant must include in its request to the Department a written agreement containing a specific date for the transfer of permit responsibility, coverage, and liability between the current and new permittee.

2. The permit shield provided for in ARM 17.8.1214 shall not extend to administrative permit amendments.

P. Emissions, Trading, Marketable Permits, Economic Incentives
ARM 17.8, Subchapter 12, Operating Permit Program §1226(2)

Notwithstanding ARM 17.8.1226(1) and (7), minor air quality operating permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in the Montana State Implementation Plan or in applicable requirements promulgated by the administrator.

Q. No Property Rights Conveyed
ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(d)

This permit does not convey any property rights of any sort, or any exclusive privilege.

R. Testing Requirements
ARM 17.8, Subchapter 1, General Provisions §105

The permittee shall comply with ARM 17.8.105.

S. Source Test Protocol
ARM 17.8, Subchapter 1, General Provisions §106

The permittee shall comply with ARM 17.8.106.

T. Malfunctions
ARM 17.8, Subchapter 1, General Provisions §110

The permittee shall comply with ARM 17.8.110.

U. Circumvention
ARM 17.8, Subchapter 1, General Provisions §111

The permittee shall comply with ARM 17.8.111.

V. Motor Vehicles
ARM 17.8, Subchapter 3, Emission Standards §325

The permittee shall comply with ARM 17.8.325.

W. Annual Emissions Inventory
ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees §505 (STATE ONLY)

The permittee shall supply the Department with annual production and other information for all emission units necessary to calculate actual or estimated actual amount of air pollutants emitted during each calendar year. Information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request, unless otherwise specified in this permit. Information shall be in the units required by the Department.

X. Open Burning

ARM 17.8, Subchapter 6, Open Burning §604, 605 and 606

The permittee shall comply with ARM 17.8.604, 605 and 606.

Y. Montana Air Quality Permits

ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources §745 and 764 (ARM 17.8 745(1) and 764(1)(b) are STATE ENFORCEABLE ONLY until approved by EPA as part of SIP)

1. Except as specified, no person shall construct, install, alter, or use any air contaminant source or stack associated with any source without first obtaining a permit from the Department or Board. A permit is not required for those sources or stacks as specified by ARM 17.8.744(1)(a)-(k).

2. The permittee shall comply with ARM 17.8.743, 744, 745, 748, and 764.

3. ARM 17.8.745(1) specifies de minimis changes as construction or changed conditions of operation at a facility holding an air quality preconstruction permit issued under Chapter 8 that does not increase the facility's potential to emit by more than 5 tons per year of any pollutant except:

   a. Any construction or changed condition that would violate any condition in the facility's existing air quality preconstruction permit or any applicable rule contained in Chapter 8 is prohibited, except as provided in ARM 17.8.745(2);

   b. Any construction or changed conditions of operation that would qualify as a major modification under Subchapters 8, 9, or 10 of Chapter 8;

   c. Any construction or changed condition of operation that would affect the plume rise or dispersion characteristic of emissions that would cause or contribute to a violation of an ambient air quality standard or ambient air increment as defined in ARM 17.8.804;

   d. Any construction or improvement project with a potential to emit more than 5 tons per year may not be artificially split into smaller projects to avoid air Montana Air Quality Permitting; or

   e. Emission reductions obtained through offsetting within a facility are not included when determining the potential emission increase from construction or changed conditions of operation, unless such reductions are made federally enforceable.

4. Any facility making a de minimis change pursuant to ARM 17.8.745(1) shall notify the Department if the change would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1) (STATE ENFORCEABLE ONLY until approved by EPA as part of the SIP).

Z. National Emission Standard for Asbestos
40 CFR Part 61, Subpart M

The permittee shall not conduct any asbestos abatement activities except in accordance with 40 CFR Part 61, Subpart M (National Emission Standard for Hazardous Air Pollutants for Asbestos).

AA. Asbestos
ARM 17.74, Subchapter 3, General Provisions and Subchapter 4, Fees

The permittee shall comply with ARM 17.74.301, *et seq.*, and ARM 17.74.401, *et seq.* (STATE ONLY).

BB. Stratospheric Ozone Protection – Serving of Motor Vehicle Air Conditioners
40 CFR Part 82, Subpart B

If the permittee performs a service on motor vehicles and this service involves ozone-depleting substance/refrigerant in the motor vehicle air conditioner (MVAC), Sidney Sugars is subject to all applicable requirements as specified in 40 CFR Part 82, Subpart B.

CC. Stratospheric Ozone Protection – Recycling and Emission Reductions
40 CFR Part 82, Subpart F

The permittee shall comply with the standards for recycling and emission reductions in 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B.

1. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practice pursuant to §82.156.

2. Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to §82.161.

4. Persons disposing of small appliances, MVACs, and MVAC-like (as defined at §82.152) appliances must comply with recordkeeping requirements pursuant to §82.166.

5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.

6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

DD. Emergency Episode Plan

The permittee shall comply with the requirements contained in Chapter 9.7 of the State of Montana Air Quality Control Implementation Plan.

Each major source emitting 100 tons per year located in a Priority I Air Quality Control Region shall submit to the Department a legally enforceable Emergency Episode Action Plan (EEAP) that details how the source will curtail emissions during an air pollutant emergency episode. The industrial EEAP shall be in accordance with the Department's EEAP and shall be submitted according to a timetable developed by the Department following Priority I reclassification.

EE. Definitions

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit shall have the meaning assigned to them in the referenced regulation.

APPENDICES

APPENDIX. A INSIGNIFICANT EMISSION UNITS

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist Sidney Sugars, the permitting authority, inspectors, and the public.

Pursuant to ARM 17.8.1201(22)(a), an insignificant emission unit means any activity or emission unit located within a source that: (i) has a potential to emit less than 5 tons per year of any regulated pollutant; (ii) has a potential to emit less than 500 pounds per year of lead; (iii) has a potential to emit less than 500 pounds per year of hazardous air pollutants listed pursuant to Sec. 7412 (b) of the FCAA; and (iv) is not regulated by an applicable requirement, other than a generally applicable requirement that applies to all emission units subject to Subchapter 12.

List of Insignificant Activities:

The following table of insignificant sources and/or activities was provided by Sidney Sugars. Because there are no requirements to update such a list, the emission units and/or activities may change from those specified in the table.

Emission Unit ID	Description
IEU004	Steam Vent Blowdown Tank Vent
IEU006	Boiler Feed Tank Vent
IEU008A, B, & C	Boiler Safety Vents
IEU009	Exhaust Steam Vents
IEU010	Generator Turbine Relief Vents
IEU011, IEU029 A & B, IEU046	Extraction & Purification Ammonia Vents
IEU012A, B, C & D	Pulp Dryer Building Roof Vent
IEU013A, B, C, D & E	Dried Pulp Warehouse Roof Vents
IEU014	Kiln Draft Fan
IEU015A & B	Kiln Building Vent Fans
IEU016	Oliver Building Vent
IEU17A, B, & C	Diffuser Roof Vents
IEU018A & B	Diffuser Vapor Vents
IEU019A, B, & C	Control House Roof Vents
IEU021	Slaker Building Wet Scrubber - Main Rotary Slaker - Mini Rotary Slaker - Mini Vibrating Slaker Feeder - Vibrating Milk of Lime Screen - Main Slaker Classifier Screw Conveyor - Mini Slaker Grit Drag Conveyor
IEU032	Maintenance Shop Vent
IEU033	Oliver Vacuum Pump Vent
IEU034	Sidney Carb Vent
IEU035A, B, & C	Benning Vent, Evaporator Supply Tank Vent, and Diffuser Supply Tank
IEU036	Suction for Oliver Air Compressor
IEU037	Second Carb Vent
IEU038	Dorr Tank Vent
IEU039	Press Steam Vapor Vent
IEU040	Oliver Wet Scrubber
IEU041	Wash House Roof Vent
IEU042	Oliver Roof Vent
IEU043B	Slaker Building Vent
IEU044	Tower Duffuser Vapor Vent
IEU045	Mixer Building Roof Vent
IEU046	Silos #1-4 with Sly Filter Baghouse
IEU057	Warehouse Packaging Dust Collection Baghouse
IEU058	Lime Kiln Vacuum System Baghouse
IEU059	Silo Vacuum System Baghouse
IEU108	Mud Pond Cleaning/Handling

Emission Unit ID	Description
IEU109	Boiler Ash Pond Cleaning/Handling
IEU110	PCC Pond Cleaning/Handling
IEU111	Portable Coal Screen
IEU112 & IEU113	(2) 1,000 Gallon Diesel Steel Horizontal Above Ground Storage Tank
IEU114	1,000 Gallon Gasoline - Steel Horizontal Above Ground Storage Tank
IEU115	50,000 Gallon No. 2 Fuel Oil - Steel Vertical Fixed Roof Above Ground Storage Tank

APPENDIX. B DEFINITIONS and ABBREVIATIONS

"Act" means the Clean Air Act, as amended, 42 U.S. 7401, *et seq*.

"Administrative permit amendment" means an air quality operating permit revision that:

(a) Corrects typographical errors

(b) Identifies a change in the name, address or phone number of any person identified in the air quality operating permit, or identifies a similar minor administrative change at the source

(c) Requires more frequent monitoring or reporting by Sidney Sugars

(d) Requires changes in monitoring or reporting requirements that the Department deems to be no less stringent than current monitoring or reporting requirements

(e) Allows for a change in ownership or operational control of a source if the Department has determined that no other change in the air quality operating permit is necessary, consistent with ARM 17.8.1225

(f) Incorporates any other type of change that the Department has determined to be similar to those revisions set forth in (a)-(e) above

"Applicable requirement" means all of the following as they apply to emission units in a source requiring an air quality operating permit (including requirements that have been promulgated or approved by the Department or the administrator through rule making at the time of issuance of the air quality operating permit, but have future-effective compliance dates, provided that such requirements apply to sources covered under the operating permit).

(a) Any standard, rule, or other requirement, including any requirement contained in a consent decree or judicial or administrative order entered into or issued by the Department, that is contained in the Montana State Implementation Plan approved or promulgated by the administrator through rule making under Title I of the FCAA

(b) Any federally enforceable term, condition or other requirement of any air quality preconstruction permit issued by the Department under subchapters 7, 8, 9, and 10 of this chapter, or pursuant to regulations approved or promulgated through rule making under Title I of the FCAA, including parts C and D

(c) Any standard or other requirement under Sec. 7411 of the FCAA, including Sec. 7411(d)

(d) Any standard or other requirement under Sec. 7412 of the FCAA, including any requirement concerning accident prevention under Sec. 7412(r)(7), but excluding the contents of any risk management plan required under Sec. 7412(r)

(e) Any standard or other requirement of the Acid Rain Program under Title IV of the FCAA or regulations promulgated thereunder

(f) Any requirements established pursuant to Sec. 7661c(b) or Sec. 7414(a)(3) of the FCAA

(g) Any standard or other requirement governing solid waste incineration, under Sec. 7429 of the FCAA

(h) Any standard or other requirement for consumer and commercial products, under Sec. 7511b(e) of the FCAA

(i) Any standard or other requirement for tank vessels, under Sec. 7511b(f) of the FCAA

(j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the FCAA, unless the administrator determines that such requirements need not be contained in an air quality operating permit

(k) Any national ambient air quality standard or increment or visibility requirement under part C of Title I of the FCAA, but only as it would apply to temporary sources permitted pursuant to Sec. 7661c(e) of the FCAA

(l) Any federally enforceable term or condition of any air quality open burning permit issued by the Department under subchapter 6

"Campaign" means the operating time it takes to process a year's harvest, generally between September and March.

"Department" means the Montana Department of Environmental Quality.

"Emission unit" means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Sec. 7412(b) of the FCAA. This term is not meant to alter or affect the definition of the term "unit" for purposes of Title IV of the FCAA.

"Excess Emissions" means any visible emissions from a stack or source, viewed during the visual surveys, believed to exceed visible emission requirements during normal operating conditions.

"Excess Fugitive Emissions" means any visible emissions that leave the plant site boundaries.

"FCAA" means the Federal Clean Air Act, as amended.

"Federally enforceable" means all limitations and conditions that are enforceable by the administrator, including those requirements developed pursuant to 40 CFR Parts 60 and 61, requirements within the Montana State Implementation Plan, and any permit requirement established pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, including operating permits issued under an EPA approved program that is incorporated into the Montana State Implementation Plan and expressly requires adherence to any permit issued under such program.

"Fugitive emissions" means those emissions that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

"General air quality operating permit" or **"general permit"** means an air quality operating permit that meets the requirements of ARM 17.8.1222, covers multiple sources in a source category, and is issued in lieu of individual permits being issued to each source.

"Hazardous air pollutant" means any air pollutant listed as a hazardous air pollutant pursuant to Sec. 112(b) of the FCAA.

"Non-federally enforceable requirement" means the following as they apply to emission units in a source requiring an air quality operating permit.

(a) Any standard, rule, or other requirement, including any requirement contained in a consent decree, or judicial or administrative order entered into or issued by the Department, that is not contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA.

(b) Any term, condition or other requirement contained in any air quality preconstruction permit issued by the Department under Subchapters 7, 8, 9, and 10 of this chapter that is not federally enforceable.

(c) Does not include any Montana ambient air quality standard contained in Subchapter 2 of this chapter.

"Permittee" means the owner or operator of any source subject to the permitting requirements of this subchapter, as provided in ARM 17.8.1204, that holds a valid air quality operating permit or has submitted a timely and complete permit application for issuance, renewal, amendment, or modification pursuant to this subchapter.

"Regulated air pollutant" means the following:

(a) Nitrogen oxides or any volatile organic compounds.

(b) Any pollutant for which a national ambient air quality standard has been promulgated.

(c) Any pollutant that is subject to any standard promulgated under Sec. 7411 of the FCAA.

(d) Any Class I or II substance subject to a standard promulgated under or established by Title VI of the FCAA.

(e) Any pollutant subject to a standard or other requirement established or promulgated under Sec. 7412 of the FCAA, including but not limited to the following:

(i) Any pollutant subject to requirements under Sec. 7412(j) of the FCAA. If the administrator fails to promulgate a standard by the date established in Sec. 7412(e) of the FCAA, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established in Sec. 7412(e) of the FCAA.

(ii) Any pollutant for which the requirements of Sec. 7412(g)(2) of the FCAA have been met but only with respect to the individual source subject to Sec. 7412(g)(2) requirement.

"Responsible official" means one of the following:

(a) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars).

(ii) The delegation of authority to such representative is approved in advance by the Department.

(b) For a partnership or sole proprietorship: a general partner or the proprietor; respectively.

(c) For a municipality, state, federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of the environmental protection agency).

(d) For affected sources: the designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the FCAA or the regulations promulgated thereunder are concerned, and the designated representative for any other purposes under this subchapter.

Abbreviations:

ARM	Administrative Rules of Montana
ASTM	American Society of Testing Materials
BACT	Best Available Control Technology
BDT	bone dry tons
BTU	British Thermal Unit
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic foot
dscfm	dry standard cubic foot per minute
EEAP	Emergency Episode Action Plan
EPA	U.S. Environmental Protection Agency
EPA Method	Test methods contained in 40 CFR 60, Appendix A
EU	emission unit
FCAA	Federal Clean Air Act
gpm	gallons per minute
gr	grains
HAP	Hazardous Air Pollutant
IEU	insignificant emission unit
MACT	Maximum Available Control Technology
Method 5	40 CFR 60, Appendix A, Method 5
Method 9	40 CFR 60, Appendix A, Method 9
MMbdft	million board feet
MMBTU	million British Thermal Units
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO_x	oxides of nitrogen
NO_2	nitrogen dioxide
O_2	oxygen
Pb	lead
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
psi	pounds per square inch
scf	standard cubic feet
SIC	Source Industrial Classification
SO_2	sulfur dioxide
SO_x	oxides of sulfur
SSM	Startup, Shutdown, and Malfunction
tpd	tons per day
tpy	tons per year
U.S.C.	United States Code
VE	visible emissions
VOC	volatile organic compound
w.c.	water column

APPENDIX. C NOTIFICATION ADDRESSES

Compliance Notifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

United States EPA
Air Program Coordinator
Region VIII, Montana Office
10 W. 15th Suite 3200
Helena, MT 59626

Permit Modifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

Office of Partnerships and Regulatory Assistance
Air and Radiation Program
US EPA Region VIII 8P-AR
1595 Wynkoop Street
Denver, CO 80202-1129

APPENDIX. D AIR QUALITY INSPECTOR INFORMATION

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist Sidney Sugars, permitting authority, inspectors, and the public.

Direction to Plant:

The Sidney Sugars Sugar Corporation sugar factory is located east of the town of Sidney in Richland County, Montana.

Safety Equipment Required:

Hardhat, steel-toed shoes/boots, and hearing protection (as necessary) are required at the facility. Hair and Beard nets (supplied by Sidney Sugars) shall be worn while occupying the sugar handling and packaging area.

Facility Plot Plan:

The facility plot plan was submitted as part of the application on March 21, 1995.

APPENDIX. E COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

Monitoring Approach for PM and SO2 for the CE Boilers #1 and #2		
	Indicator No. 1	**Indicator No. 2**
A. General Criteria		
1. Performance Indicator	Steam generation rate	Scrubber differential pressure
2. Measurement Approach	Orifice meter to measure steam flow rate	Differential pressure transducer
3. Indicator Range	An excursion is defined as an hourly average steam generation level of less than 50,000 lb/hr or greater than 100,000 lb/hr. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a 1-hour average differential pressure below 9.5 inches of water or greater than 12.5 inches of water. Excursions trigger an inspection, corrective action, and a reporting requirement
B. Performance Criteria		
Data Representativeness	The orifice is located in the steam line.	The differential pressure transducer monitors the static pressure upstream and downstream of the scrubber's venturi throat.
Verification of Operational Status	N/A	N/A
QA/QC Practices and Criteria	Calibrated on initial installation	Monthly comparison to a U-tube manometer. Acceptable criteria is 0.5 in. w.c.
Monitoring Frequency Data Collection Procedures Averaging Period	Measured continuously Continuous data is measured and stored on a strip chart from which 1-hour averages can be calculated. 1-hour	Measured continuously Operator takes readings every 15-minutes and logs readings from which 1-hour averages can be calculated. 1-hour

Enhanced Monitoring Approach for PM and SO2 for the CE Boilers #1 and #2		
	Indicator No. 1-E	**Indicator No. 2-E**
A. General Criteria		
1. Performance Indicator	Scrubber water recirculation flow rate	Scrubber water pH
2. Measurement Approach	Flow meters to measure scrubber water recirculation flow rate to each scrubber unit	In-line pH meters
3. Indicator Range	An excursion is defined as an hourly average of scrubber water recirculation flow rate of less than 250 gpm. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a 1-hour average pH below 6.2 units. Excursions trigger an inspection, corrective action, and a reporting requirement.
B. Performance Criteria		
1. Data Representativeness	Flow meters located on scrubber recirculation lines	The in-line pH meters monitor the pH of the scrubber water.
2. Verification of Operational Status	N/A	Daily checks and calibrations with a laboratory pH meter.
3. QA/QC Practices and Criteria	Calibrated on initial installation	Weekly comparison to a laboratory meter. Acceptable criteria is ± 0.2 pH unit variability between in-line meters and laboratory meter
4. Monitoring Frequency	Measured continuously	Measured continuously
Data Collection Procedures	Continuous data is measured and operator takes readings at 2-4 intervals during each hour and logs readings from which 1-hour averages can be calculated	Operator takes readings 2-4 intervals during each hour and logs readings from which 1-hour averages can be calculated, and/or continuous data is measured and stored on a strip chart from which 1-hour averages can be calculated.
Averaging Period	1-hour	1-hour

Although the complete hard copy of Appendix E is not included in the permit, the contents of Appendix E, Sidney Sugars' CAM Plan remain as applicable requirements as stated in the Title V Operating Permit #OP1826-09. To receive a hard copy of this appendix, please contact one of the following:

The Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
1520 E. Sixth Ave.
P.O. Box 200901
Helena, MT 59620-0901
Bureau Phone #: (406) 444-3490

OR

Sidney Sugars Incorporated
R.R. 1, Box 3011
Sidney, Montana 59270
Phone #: (406)-433-3303